Alliance of Automobile Manufacturers: Position on Multiple Models

Alliance OF AUTOMOBILE MANUFACTURERS

From:	Ms. Julie Becker, Vice President, Environmental Affairs, Alliance of Automobile Manufacturers
To:	Mr. Chester J. France, Director, Assessment and Standards Division, US EPA
	Ms. Julie Abraham, Director, Office of International Policy and Harmonization, NHTSA
	Mr. John Holmes, Senior Staff Officer, National Research Council (NRC)
Date:	March 6, 2008

Note: This context of this letter was recommendations from the Alliance to EPA, NHTSA, and the NRC on how the NRC should approach assessing fuel economy technology improvements for the NRC study, "Assessment of Fuel Economy Technologies for Light-Duty Vehicles", which was ultimately published in 2011

Subject: Model Usage for Assessing LDV Technologies Impact

"Our purpose in writing this letter is to <u>encourage you in your final deliberations to use more than one modeling approach in estimating the potential improvements in fuel economy</u> expected from the deployment of the individual technologies you are considering as well as combinations of those technologies. Our expectation would be that if the estimated fuel economy impacts generated by different models are similar, then the results would be considered robust. If there were significant discrepancies between estimates generated by one or more models, then either the accuracy of the models or the veracity of an individual model's fuel economy improvement estimate should be considered suspect."

Alliance of Automobile Manufacturers (AAM): Criteria for Proper Modeling

March 2008 letter from Alliance to EPA/NHTSA/NRC

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"In evaluating each modeling approach we believe that the panel should consider the following:

Model Evaluation Criteria, per AAM	EPA Modeling
Are the inputs for each model well defined?	✓
Is the baseline -- against which the impacts of the deployment of fuel economy improvement technologies are being assessed -- uniform and well defined?	✓
Is it clear how the impacts of the application of fuel economy technologies are being modeled?	✓
Is it clear how a model addresses the cumulative impact of multiple fuel economy technologies?	✓
Is the model capable of addressing the impacts of different drive cycles on fuel economy?	✓
Has the model been validated against data from actual vehicles?	✓
Does the model hold relevant attributes (e.g. weight, 0 to 60 time, gradability, and towing capacity) constant when assessing the impacts of fuel economy technologies?"	✓

AAM: *"We believe that it is critical that the answer to each of the above questions be yes."*